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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

CIVIL L.R. 7-11 and 79-5(f)

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f) and the Stipulated Protective Order entered by the Court on August, 17, 2018 (ECF No. 122), Plaintiffs submit this Administrative Motion to Consider Whether Another Party's Materials Should Be Sealed. The materials under consideration are the full transcripts of all depositions of Simon Cross, as well as the depositions of David Miller and Michael Fahey, that were taken in this case, which the Court ordered Plaintiffs to file. ECF No. 1066.

| | Documents | Portions Sought to be Sealed | Evidence Offered in Support of Sealing |
|---|--|---|--|
| 1 | Full 30(b)(6) Deposition Transcript of Simon Cross (May 9, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f) |
| 2 | Full 30(b)(6) Deposition Transcript of Simon Cross (May 12, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" Information; Defendant to provide evidence, per Local Rule 79-5(f) |
| 3 | Full 30(b)(6) Deposition Transcript of Simon Cross (June 6, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" Information; Defendant to provide evidence, per Local Rule 79-5(f) |
| 4 | Full 30(b)(6) Deposition Transcript of Simon Cross (June 20, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as "Confidential" or "Highly Confidential— |

| | Documents | Portions Sought to be Sealed | Evidence Offered in Support of Sealing |
|---|--|---|---|
| | | | Attorneys' Eyes Only" Information; Defendant to provide evidence, per Local Rule 79-5(f) |
| 5 | Full 30(b)(6) Deposition Transcript of Simon Cross (June 21, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" Information; Defendant to provide evidence, per Local Rule 79-5(f) |
| 6 | Full 30(b)(6) Deposition Transcript of David Miller (July 22, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" Information; Defendant to provide evidence, per Local Rule 79-5(f) |
| 7 | Full 30(b)(6) Deposition Transcript of Michael Fahey (July 21, 2022) | Entire document (Plaintiffs to file a more targeted motion to seal) | Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as "Confidential" or "Highly Confidential—Attorneys' Eyes Only" Information; Defendant to provide evidence, per Local Rule 79-5(f) |

Consistent with the Court's October 17, 2022 Order (ECF No. 1066), Plaintiffs will file a more targeted motion to seal by October 28, 2022.

Dated: October 18, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
Lesley E. Weaver

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Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of October, 2022, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on October 18, 2022, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record. I also caused a copy of the under seal filing to be delivered to counsel for Defendant Facebook, Inc. via electronic mail.

/s/ Lesley E. Weaver

Lesley E. Weaver